

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

In re:	:	
	:	
AZIM FEDA	:	Chapter 7
Debtor	:	Case No. 12-12001
	:	
	:	
	:	
Mustafa Wafa	:	
Plaintiff	:	
v.	:	
	:	
Azim Feda	:	Adversary Proceeding No.
	:	15-01079
Defendant(s)	:	

DEBTORS' ANSWER TO COMPLAINT OBJECTING TO
DISCHARGEABILITY OF DEBT

Debtor, through undersigned counsel, responds to the Complaint

Objecting to Dischargeability of Debt filed herein by Mustafa Wafa

as follows:

1. The allegations of paragraphs 1, 2, 3, 4, 5, 6, 11, 12, 13, 14, 15, 20, 22 and 27 are admitted.

2. The allegations of paragraphs 7, 19, 21, 25, 26, 28, 30, 31 and 32 are denied.

3. Debtor is unable to admit or deny the allegations of paragraphs 8, 9, 10, 16, 17, 18, 23, 24 and 29 and demands strict proof thereof.

Nathan Fisher, VSB #37161
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642
Counsel for Defendant

4 The \$100,000.00 loan referenced in this case was made by Mustafa Wafa to Edward Marin.

5. The Debtors' role in the transaction was as a guarantor.

6. The Debtor did not receive the \$100,000.00 loan.

7. The Promissory Note contains latent ambiguity mistakes rendering the contract invalid.

WHEREFORE, Azim Feda prays that the Plaintiff's Complaint Objecting to Dischargeability of Debt be denied and for such other and further relief as the Court deems just and appropriate.

Dated: July 5, 2015

Respectfully Submitted
Azim Feda
By Counsel:

/s/ Nathan Fisher
Nathan Fisher
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642
VSB #37161

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of July 2015, I served the foregoing, via first-class mail, on the following, who are all necessary parties under Local Rule 4001(a)-1(E)(1):

**Gregory H. Counts, Esq.
Tyler, Bartl, Ramsdell & Counts
300 N. Washington St., Suite 202
Alexandria, VA 22314-4252**

**/s/ Nathan Fisher
Nathan Fisher**